

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division**

CHARLENE CARTER, Plaintiff, v. SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556, Defendants.	Civil Case No. 3:17-cv-02278-X
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**[Proposed] Order Granting Plaintiff's Motion to Compel Discovery
from Transport Workers Union of America, Local 556**

Before the Court is Plaintiff Charlene Carter's Motion to Compel Discovery from Defendant Transport Workers Union of America, Local 556. After considering the Motion, the Court finds that the Motion should be granted.

IT IS THEREFORE ORDERED that Plaintiff's Motion to Compel Discovery is hereby GRANTED. The Court also RULES and ORDERS as follows:

1. Defendant Local 556 waived attorney-client, work product, and privacy/confidentiality objections to Plaintiff's Request for Production Nos. 1-13, 15, 18-22, 24, and Interrogatories 1-2, and its objections are all OVERRULED.

2. Defendant Local 556's objections that Plaintiff's Requests for Production Nos. 9-11, 13, 18, 19, 21-23, and Interrogatories 1-3, are overbroad, unduly burdensome, vague and ambiguous, and not reasonably limited in time, are all OVERRULED.

3. Defendant Local 556's "subject to and without waiving objections" responses to RFPs 1-13, 15, 18-20, 23-24, and Interrogatories 1-2, waived any objections not specifically set forth in its responses, and any such objections are hereby OVERRULED.

4. Defendant Local 556 is ORDERED to supplement its responses and identify by name or bates number which specific documents produced are responsive to Plaintiff's Requests for Production and Interrogatories.

5. Defendant Local 556 is ORDERED to respond to the Plaintiff's Interrogatories and produce all documents responsive to Plaintiff's Requests for Production that are in its possession, custody, or control in accordance with this Order, including documents subject to this Court's November 5, 2019 Protective Order, within thirty (30) days after the date of this Order.

6. The Court further orders that Defendant Local 556 shall pay to Plaintiff her reasonable attorneys' fees and expenses in an amount to be determined by this Court. Plaintiff shall file with the Court evidence of such attorneys' fees and expenses within thirty (30) days after the date of this Order.

SIGNED on _____, 2020.

Brantley Starr
United States District Judge